

## REMARKS

This is intended as a full and complete response to the Office Action dated June 4, 2003, having a shortened statutory period for response set to expire on September 4, 2003. Claims 1 - 20 were considered by the Examiner and rejected. Claims 1 - 20 pending in the application and are shown above. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-20 stand rejected by the Examiner under 35 U.S.C. § 102(e) as being anticipated by, or under 35 U.S.C. § 103(a) as being unpatentable over, U.S. Patent Pub. No. 2002/0168923 (*Kaufman, et al.*). The Examiner asserts that *Kaufman, et al.* discloses a pressure sensitive solution and one or more chemical agents comprising a complexing agent for complexing with a metal or oxidized metal. Applicants respectfully traverse this rejection.

*Kaufman, et al.* discloses a chemical mechanical polishing slurry for polishing copper alloy, titanium, titanium nitride, tantalum, tantalum nitride, comprising an oxidizing agent, a complexing agent, an abrasive, and an optional surfactant, and the slurry does not contain a separate film-forming agent. *Kaufman, et al.* is silent as to pressure sensitive solutions.

*Kaufman, et al.* does not teach, show, or suggest a composition for planarizing a substrate comprising a pressure sensitive solution and one or more chemical agents comprising a complexing agent for complexing with a metal or oxidized metal, wherein the complexing agent is selected from the group of ammonium salts of organic acids, amines, amine derivatives, compounds with one or more peroxy acid groups, ions of at least one transition metal, and combinations thereof, as recited in claim 1, and claims dependent thereon. Withdrawal of the rejection is respectfully requested.

*Kaufman, et al.* does not teach, show, or suggest a method for planarizing a substrate surface, comprising applying a composition to polishing media, the composition comprising a pressure sensitive solution and one or more chemical agents comprising a complexing agent for complexing with a metal or oxidized metal, wherein the complexing agent is selected from the group of ammonium salts of organic acids,

amines, amine derivatives, compounds with one or more peroxy acid groups, ions of at least one transition metal, and combinations thereof and polishing the substrate surface, as recited in claim 9, and claims dependent thereon. Withdrawal of the rejection is respectfully requested.

The prior art made of record is noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, it is believed that a detailed discussion of the secondary references is not deemed necessary for a full and complete response to this office action. Accordingly, allowance of the claims is respectfully requested.

In conclusion, the references cited by the Examiner, neither alone nor in combination, teach, show, or suggest the method or composition of the present invention. Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



---

Keith M. Tackett  
Registration No. 32,008  
MOSER, PATTERSON & SHERIDAN, L.L.P.  
3040 Post Oak Blvd., Suite 1500  
Houston, TX 77056  
Telephone: (713) 623-4844  
Facsimile: (713) 623-4846  
Attorney for Applicant(s)